

# EXHIBIT A

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DONALD AGEE, JR., an individual, *et al.*,

Plaintiffs,

v.

JOCELYN BENSON, in her official capacity  
as the Secretary of State of Michigan, *et al.*;

Defendants.

Case No. 1:22-cv-00272

**Three-Judge Panel Appointed Pursuant to  
28 U.S.C. § 2284(a)**

**AFFIDAVIT OF DENNIS LEROY BLACK, JR.**

STATE OF MICHIGAN     )  
                                  ) ss.  
COUNTY OF WAYNE     )

I, Dennis Leroy Black, Jr., having been first duly sworn, deposes and states as follows:

1. I have personal knowledge concerning the statements contained in this Affidavit, and if called to testify, can testify competently to the facts stated in this Affidavit.

2. I am a Black man and regularly vote in general and primary elections, including Democratic primary elections.

3. Since its inception, I have been a plaintiff in the above lawsuit.

4. For my entire life I have lived in the metropolitan Detroit area, specifically the City of Detroit and most recently the City of Hamtramck which surrounds the City of Detroit.

5. Because I have lived in the area my entire life, I have a vast amount of knowledge and understanding of the community, political landscape, and the hardships and discrimination that continues to harm Black persons.

6. At the time the Amended Complaint was filed my address was 19140 Algonac St., Detroit, MI 48234, which falls within House District 13. ECF No. 8, PageID.90.

7. Within the last 8-10 months I moved to 9491 McDougall St., Hamtramck, MI 48212, which falls within House District 9.

8. Under the current redistricting maps, my two previous residential addresses fall within House District 13.

9. It is inevitable that at some point over the next 8 years that I will relocate my residence within the area in House District 13. As I understand, the voting districts maps have to be redrawn at the end of that time.

10. The Commission has personally subjected me to a racial classification based on my status as a Black man. The way House District 13 was drawn cuts-off before reaching the heart of downtown Detroit, which has a high population of Black voters. Had the Commission not purposefully attempted to avoid this area in drawing House District 13, my current residence would have likely fell within it.

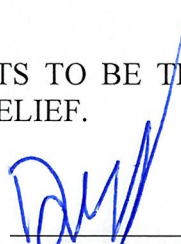
11. It is clear to me that Black voters and the Black community have seen, and will continue to see at increasing level, our political influence drastically diminished as a result of the current district maps.

12. I am willing and ready to continue my participation in this lawsuit to advocate and fight for the right of myself and my fellow Black voters to participate in elections and the political process with the protections under the law. These new districts violate those protections.

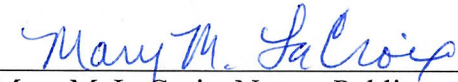
FURTHER AFFIANT SAYETH NOT.

I DECLARE THE ABOVE STATEMENTS TO BE TRUE TO THE BEST OF MY  
KNOWLEDGE, INFORMATION, AND BELIEF.

Dated: June 5, 2023

  
\_\_\_\_\_  
DENNIS LEROY BLACK, JR.

Subscribed and sworn to before me  
this 5th day of June, 2023.

  
\_\_\_\_\_  
Mary M. LaCroix, Notary Public  
Macomb County, MI  
My Commission Expires: 03/19/2029  
Acting in the county of: Wayne

MARY M. LACROIX  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF MACOMB  
MY COMMISSION EXPIRES Mar 19, 2029  
ACTING IN COUNTY OF 